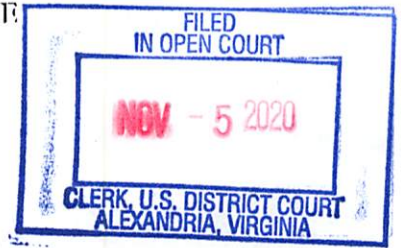


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

v.

FILIPPO PARLAGRECO,

Defendant.

Case No. 1:20-CR-243

STATEMENT OF FACTS

The United States and the defendant, FILIPPO PARLAGRECO (hereinafter, "the defendant"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. From at least in or about 2016 through at least in or about January 2020, the defendant did knowingly produce or attempt to produce child pornography by soliciting sexually explicit images from minors using the internet.

2. In the summer of 2017, MINOR VICTIM 1 began communicating with an individual, later identified as the defendant, on multiple social media applications. MINOR VICTIM 1 sent the defendant nude photos of herself. A year later, MINOR VICTIM 1 saw the photographs she had sent to the defendant posted on another social media application. The defendant told MINOR VICTIM 1 that the photographs would only be removed from the application if she sent him additional images. At the defendant's demand, MINOR VICTIM 1 sent an additional, partially nude photograph of herself with her genitalia visible. MINOR VICTIM 1 then reported these interactions to her parents, who in turn reported them to the local police in her city.

3. Over the course of almost a year, the defendant created additional social media accounts across multiple applications and contacted MINOR VICTIM 1 with additional demands. The city police department obtained search warrants for these social media accounts. IP addresses associated with these accounts were assigned to the defendant at his residence and to his mother at her residence, both of which locations were in Warrenton, Virginia, which is within the Eastern District of Virginia. The defendant continued to contact MINOR VICTIM 1 to demand the production of sexually explicit images through at least on or about March 17, 2020.

4. A search warrant for the defendant's residence was obtained from the U.S. District Court for the Eastern District of Virginia and was executed on April 24, 2020. During the course of the search, the defendant was interviewed voluntarily by law enforcement. The defendant truthfully answered law enforcement questions, at least in part. The defendant admitted that he met people online and that those people would send him "images." He also admitted to making threats to put "The thought into their head that some of their stuff might get leaked." He further admitted that he would contact those people's "friends list" in an attempt to find others who had nude photos of them. In engaging with these individuals online, he would sometimes pose as a teenage girl. When asked about his age of sexual preference, the defendant stated it was between "12 and 15" years old. The defendant also provided his online account information to law enforcement and authorized law enforcement to take over his accounts.

5. Devices seized from the defendant during that search corroborated his statements and further illuminated the defendant's long-standing pattern of finding minors online, using sensitive photographs of them to try to extort the minors into producing additional, sexually

explicit photographs, collecting those photographs, and occasionally distributing those photographs.

6. Specifically, data on the devices seized from the defendant along with chats recovered from his social media accounts and interviews with the victims establish that the defendant caused the production or attempted production of sexually explicit material of the following minors:

Victim	Date of Production or Attempted Production	Age of Victim at Earliest Time
MINOR VICTIM 1	April 18, 2018 through March 17, 2020	14 years old
MINOR VICTIM 2	December 16, 2019	11 years old
MINOR VICTIM 4	October 2019 through December 2, 2019	11 years old
MINOR VICTIM 6	November 29, 2019 through December 16, 2019	16 years old
MINOR VICTIM 8	February 2018	12 years old
MINOR VICTIM 9	October 23, 2019	17 years old
MINOR VICTIM 11	2016 through January 2020	14 years old

7. From at least on or about December 21, 2019 through at least on or about February 12, 2020, the defendant did knowingly distribute sexually explicit images minors.

8. As detailed in his admissions during the search, the defendant would contact the online "friends" of his victims in search of additional images. In January 2020, the defendant contacted an acquaintance of MINOR VICTIM 11 requesting additional sexually explicit images of MINOR VICTIM 11. During this conversation, the defendant sent a sexually explicit image of MINOR VICTIM 11 to the acquaintance.

9. In addition to seeking production of child pornography from his victims, the defendant would also sometimes create social media accounts in the name of his victims with

photographs of his victims. One such account, which MINOR VICTIM 1 discovered on February 12, 2020, included the sexually explicit image of MINOR VICTIM 1.

10. The defendant also used multiple messaging applications to send and receive sexually explicit images from others. These images included images of sadistic and masochistic abuse of children, as well as sexually explicit images of toddlers. On multiple occasions, the defendant sent sexually explicit images to others. On December 21, 2019, the defendant sent sexually explicit images of MINOR VICTIM 2 to another user on one such messaging application.

11. From at least in or around 2016 through on or about April 24, 2020, the defendant did knowingly possess and attempt to possess sexually explicit images of minors.

12. At the time of the search of the defendant's residence, the defendant maintained a large collection of sexually explicit images of minors, some of whom have been identified by law enforcement and some of whom have not. These images included images of children who appear to be as young as approximately 6 years old. At this time, the government has identified among the defendant's collection of sexually explicit images the following victims: MINOR VICTIM 1, MINOR VICTIM 2, MINOR VICTIM 3, MINOR VICTIM 5, MINOR VICTIM 6, MINOR VICTIM 7, MINOR VICTIM 8, MINOR VICTIM 9, MINOR VICTIM 10, MINOR VICTIM 11, MINOR VICTIM 12, MINOR VICTIM 13, and MINOR VICTIM 14.

13. The true identities of the minors listed herein are known to the United States. The identities are not disclosed here to protect their privacy.

14. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

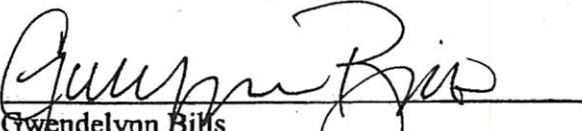
15. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

Date: October 22, 2020

By:


Gwendelynn Bills
Special Assistant United States Attorney
Jonathan Keim
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, FILIPPO PARLAGRECO, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



FILIPPO PARLAGRECO

I am Blair Howard, defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Blair Howard, Esq.
Attorney for FILIPPO PARLAGRECO